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January 25, 2023

VIA ELECTRONIC MAIL

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RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Counsel:

Pursuant to the Court's recent Scheduling Order, I provide you with the persons I wish to depose, exclusive of the 30(b)(6) deposition of the Defendants and OPTIS's witnesses, who will need to be scheduled after written discovery when it is completed.

- David Smith
- Merlin Figueira
- Garry Stoker
- Kenia Johny
- Andreas Constantinou
- Terrence Keogh
- Tom Kologinczak
- Charlotte Pratt-Horowitz
- Rawle Granger
- Coury Hodge
- Chetraum Persaud

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- Frank Keich
- David Redd of Acuren Inspection Services
- 30(b)(6) Versa Integrity
- 30(b)(6) Traeger Brothers
- Sebastian Meretti

Please let me know if any will be voluntarily produced and, if not, their addresses.

I have the following dates to schedule depositions by the deadline of June 16, 2023:

- March 20th, 2023, through March 23rd, 2023;
- April; 4th, 2023, in the afternoon;
- April 5th, 2023 and April 6th, 2023;
- April 17th and April 18th, 2023;
- April 25th, 2023;
- May 18th, 2023 and May 19th, 2023;
- May 22nd, 2023 and May 23rd, 2023;
- May 24th, 2023, in the afternoon;
- May 25th, 2023 and May 26th, 2023;
- May 30th, 2023, in the afternoon and May 31st, 2023
- June 1st, 2023, in the afternoon and June 2nd, 2023
- June 5th, 2023 through June 9th, 2023;
- June 12th, 2023 through June 16th, 2023.

I will want to take the 30(b)(6) deposition starting June 2nd, 2023.

Please respond as to your available dates for depositions, so that we can tie down what dates are available, and get a deposition scheduled to the Court by the deadline.

Cordially,

A handwritten signature in blue ink, appearing to read 'Lee J. Rohn', with a stylized flourish at the end.

Lee J. Rohn, Esq.

LJR/kj